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8 Attorney for Defendant, DEREK GALANIS

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10
11 UNITED STATES DISTRICT COURT
12 SOUTHERN DISTRICT OF NEW YORK
13

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 DEREK MEYER GALANIS,

18 Defendant.

) Case No.:
) 15 CRIM 643 PKC
)
) DECLARATION OF MEGHANN McENROE IN
) SUPPORT OF WAIVER OF CONFLICT
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21 DECLARATION OF MEGHANN McENROE
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23 I, MEGHANN McENROE, declare as follows:

- 24 1) I am over eighteen years of age, and a citizen of the United States of America.
- 25 2) On June 26, 2014, I testified in the jury trial in the matter of United States v. Tagliaferi,
26 in United States District Court in the Southern District of New York.
- 27 3) In that matter of U.S. v. Tagliaferi, I was not a defendant, a target, or a party.
- 28 4) My attorney in that matter was Anthony John Brass of 3223 Webster Street, San
Francisco, California 94123.

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- 2 5) Mr. Brass had represented me for several months during to trial preparation process prior
- 3 to June 26, 2014.
- 4
- 5 6) After my testimony in the jury trial, my representation by Mr. Brass was concluded.
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- 7 7) On September 29, 2015, Mr. Brass advised me that he had been contacted by Derek
- 8 Galanis seeking representation in a new case, charged in United States District Court in
- 9 the Southern District of New York.
- 10
- 11 8) Mr. Brass advised me that the case may be related factually to the matter of United States
- 12 v. Tagliaferi, in which I was a witness, and that a possible conflict existed.
- 13
- 14 9) Mr. Brass has informed me that his representation of Derek Galanis in no way diminishes
- 15 the duty of loyalty and confidentiality that he owes me, and that those obligations remain
- 16 in place.
- 17
- 18 10) Mr. Brass informed me that if I was not comfortable with his representing Derek Galanis,
- 19 the brother of my former employer, Jason Galanis, that he would not represent him.
- 20
- 21 11) Mr. Brass informed me that in the event that I was subpoenaed to testify in the matter
- 22 currently pending against Derek Galanis, as well as Jason Galanis, my former employer,
- 23 the Court could appoint new counsel for me free of charge.
- 24
- 25 12) Mr. Brass provided me with, and I have reviewed, the transcript of the proceedings in the
- 26 above entitled action that took place on November 9, 2015, specifically pages 28 through
- 27 43, which pertain to this issue.
- 28
- 13) I have informed Mr. Brass that I understand the potential conflict in this matter, that I
- understand that I continue to be protected by the duty of loyalty and confidentiality owed

1 to me by Mr. Brass, and that I hereby waive any conflict with Mr. Brass representing
2 Derek Galanis.

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4 I declare that the foregoing is true and correct under penalty of perjury this 18th day of
5 November, 2015. Signed in Los Angeles, California.

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8 MEGHANN McEnroe